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1 a civil lawsuit in Rhode Island?

2 A. No, I don't.

3 Q. Do you know what court had jurisdiction
4 over that part of Rhode Island?

5 A. No, I don't.

6 Q. Okay. Any other claims or lawsuits other
7 than what we've mentioned so far?

8 A. Not to my knowledge.

9 Q. Was the Workers Compensation claim that you
10 recently resolved the only Workers Compensation
11 claim you've ever filed?

12 A. Yes.

13 Q. And the disability claim for long term
14 disability, is that the only long term disability
15 claim you ever filed?

16 A. I believe so, yes.

17 Q. And in terms of SSDI benefits, you've only
18 applied for those one time; is that right?

19 A. Yes.

20 Q. Do you remember who recommended that you
21 treat with Dr. Walters?

22 A. I believe it -- to the best of my
23 knowledge, it was Dr. Yearwood.

24 MR. AHERN: That's all I have. Thanks.

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1 MR. HONIK: Any more from anyone else?

2 MS. LINDEMANN: Yeah, I'm going to ask
3 some questions. Do you want me to wait?

4 MR. HONIK: Go right ahead.

5 CROSS-EXAMINATION

6 Q. (BY MS. LINDEMANN) Hi, Mrs. Genereux. I'm
7 Frances Lindemann, and I'm the lawyer for Hardric
8 Industries. And I'm sorry to be last and having to
9 ask you questions, but I'm really interested in the
10 period of time from 1982 to 1990 and your work at
11 Raytheon.

12 A. Mm-hmm.

13 Q. So if we can go back there a little bit. I
14 understood you saying that you only worked with
15 basically two assembly drawings, the ARCO and the
16 tall man?

17 A. Right.

18 Q. Does that mean that you were on two
19 projects during that eight years?

20 A. Those were the two main things that I had
21 to do.

22 Q. And so basically, it was sort of an
23 assembly line process where you had a particular
24 part or component that you would put together, and

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1 then you'd hand it on to someone else?

2 A. Right. Then it would go off somewhere
3 else.

4 Q. Okay. And I've read a description in -- I
5 think it was probably in Colorado -- of you working
6 with windows?

7 A. That's what they called beryllium. The
8 ceramic was called the window, you know.

9 Q. Okay. And was that ARCO or tall man?

10 A. They were both called windows.

11 Q. Okay. So they were both windows?

12 A. Yeah, that's just the name that they used
13 to call them.

14 Q. Okay. Were there different windows in the
15 ARCO and in the tall man? I mean, the windows was
16 the piece, the beryllium oxide piece?

17 A. Right.

18 Q. Okay. And what size were they, roughly,
19 the ones that you worked with?

20 A. ARCO was a diameter rather large and thick,
21 where the tall man was a rectangle, and it was
22 thick, but it was rectangle and -- you know, off
23 the top of my head, to remember exactly how big, I
24 would say like this and probably this wide.

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1 Q. Okay. And when you say thick, can you show
2 me with your fingers?

3 A. Well, ARCO was your thicker, so I'm going
4 to estimate it to be approximately like this.

5 Q. Okay.

6 A. And the other one was a little thicker,
7 because you know, it -- you had like different
8 steps, you know?

9 Q. Now, the only time that you actually
10 created dust with those beryllium oxide pieces, was
11 that when you were sandblasting?

12 A. Right.

13 Q. And the description that you made of
14 working on a window and putting it in copper or
15 some other metal and brazing it --

16 A. Right.

17 Q. -- was that both tall man and ARCO?

18 A. Right.

19 Q. Do you know what they were used for
20 ultimately?

21 A. No.

22 Q. You said that those two projects were what
23 you worked on primarily?

24 A. Right.

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1 Q. Can you recall any other projects?
 2 A. I'd be given small pieces and asked to
 3 weld, take this little piece and weld it on to that
 4 one, just spot weld it, you know. So you would go
 5 and you might weld 25 of them, and you didn't have
 6 anything to work with; you just welded them. It
 7 could have been used for somebody else to continue
 8 it on.
 9 Q. Was that beryllium?
 10 A. I don't know. I didn't get anything except
 11 told exactly -- one person would show you how to do
 12 it, and then you would repeat the process for as
 13 many as there were.
 14 Q. With the tall man and with the ARCO, was
 15 your process the same of putting it together where
 16 you would put -- do the brazing, put them in the
 17 metal, and all the -- and put in the flanges? Were
 18 they the same design except for different shapes?
 19 A. I'm going --
 20 Q. If you can describe?
 21 A. If I can correct you on it --
 22 Q. Yeah.
 23 A. I believe it to be similar. You had
 24 various materials being put together. You aligned

1 another week --
 2 A. Oh, no.
 3 Q. -- sometimes or would it be --
 4 A. You would -- I'm going to say you could
 5 easily probably average ten ARCO's to completion
 6 every week, and by the end of the week, you would
 7 do a massive final sandblasting for shipping.
 8 Q. Okay. How many years of that time period
 9 did you work on the ARCO project, do you think?
 10 A. From beginning until I left to QC.
 11 Q. Okay. And how many years did you work on
 12 the tall man?
 13 A. Oh, that didn't come into play until maybe
 14 after a year or so after I was in the lab, when
 15 they were sure I wasn't going to screw up on it.
 16 Q. So was tall man more complex?
 17 A. Yes.
 18 Q. And how many, an average, would you guess
 19 that you made of those a week when you worked on
 20 them?
 21 A. My best, probably four or five.
 22 Q. What would you say your average was?
 23 A. Three.
 24 Q. Did either of these projects incorporate

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1 them. Some pieces -- like the bosses had to be
 2 welded on first. You know, you would clean that
 3 and then you would put the Eutectic or whatever
 4 brazing compound they needed. You would load it
 5 into a stainless steel grained fixture. This
 6 fixture would go on to brazing. A day or two
 7 later, you would get the fixture back. And another
 8 person would check for leaks or holes in the
 9 soldering or the brazing. And when it passed that
 10 person, you would get it back and it would need to
 11 be cleaned up, brushed, looked for defects on it
 12 and then it went on.
 13 Q. And that was true with regard to both ARCO
 14 and tall man?
 15 A. Right, just different fixtures, different
 16 sizes.
 17 Q. In a week, what would be the average number
 18 of units you would make? Or work on; excuse me.
 19 A. Every week was so different. It really
 20 varied depending on how difficult it was. If you
 21 had pieces that you really had to work and file to
 22 fit to get them in that specification, you would
 23 spend more time with it.
 24 Q. But would it be, say, one one week and ten

1 tubing -- you know, circular tubes -- in any way?
 2 A. No.
 3 Q. Only one more.
 4 A. Mm-hmm.
 5 Q. As you sit here and you think about all the
 6 dust, the dust I've heard in the -- in the bench
 7 area and sandblasting and at home, was it similar
 8 dust? Would you recall it as being the same kind
 9 of dust?
 10 A. Somewhat similar. I mean, what I had at
 11 home would be in my smock pockets. Back then, we
 12 wore pants with cuffs; in your cuffs of your pants,
 13 you know, and it definitely was the stuff that I
 14 was sandblasting with or sandblasting.
 15 Q. So it was the same color in all three
 16 places?
 17 A. Oh, yeah.
 18 Q. And it was white?
 19 A. Right. White.
 20 Q. Okay. No more questions. Thank you.
 21 REDIRECT EXAMINATION
 22 Q. (BY MR. UBERSAX) I just have a couple,
 23 then we'll get out of here. Did either the tall
 24 man or the ARCO include helical rods?